

Attachment 6

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

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SHAUNA WILLIAMS, et al.,

Plaintiffs,

vs.

Case No. 23-CV-1057

REPRESENTATIVE DESTIN

HALL, etc., et al.,

Defendants.

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NORTH CAROLINA STATE

CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

Case No. 23-CV-1104

PHILIP BERGER, etc., et al.,

Defendants.

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The Remote Deposition of

JONATHAN RODDEN, Ph.D.

October 28, 2024

11:00 a.m.

Cynthia Sullivan, RPR

1 APPEARANCES:

2  
3 On behalf of the Plaintiffs:

4 Elias Law Group, by

5 ALISON GE, ESQ.

6 JYOTI JASRASARIA, ESQ.

7 250 Massachusetts Avenue NW

8 Suite 400

9 Washington, D.C. 20002

10 age@elias.law

11 On behalf of the Defendants:

12 Baker & Hostetler, by

13 PATRICK T. LEWIS, ESQ.

14 127 Public Square

15 Suite 2000

16 Cleveland, Ohio 44114

17 (216) 861-7096

18 plewis@bakerlaw.com

19 and

20 Nelson Mullins Riley &

21 Scarborough, by

22 ALYSA RIGGINS, ESQ.

23 P.O. Box 641040

24 Chicago, Illinois 60664

25 alyssa.riggins@nelsonmullins.com

1        REMOTE APPEARANCES, Continued:

2        ALSO PRESENT:

3                    Sean Trende

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1 indicate here at the bottom of page 17, this is  
2 where you start looking at race versus party,  
3 and you indicate that, "The 2023 plan produces  
4 ten Republican leaning districts, three  
5 Democratic leaning district, and one highly  
6 competitive district."

7 Is it fair to say that your -- how  
8 do you tabulate -- how do you define a  
9 Republican leaning district?

10 A. This is using the -- the index  
11 of -- of Republican or Democratic voting that  
12 was also used by -- by Dr. Barber, and anything  
13 that is -- that is above .5 averaging over all  
14 these races -- averaging over all these  
15 elections is considered a Republican leaning  
16 district.

17 Q. I see. Okay. So essentially  
18 50 percent plus one vote on Dr. Barber's  
19 partisan voting index would -- would make it  
20 Republican leaning in your mind?

21 A. Yes.

22 Q. Okay. And if we wanted to, we  
23 could have defined a Republican leaning  
24 district, for example, as a district that had  
25 say a minimum of a 55 percent vote share; isn't

REPORTER'S CERTIFICATE

The State of Ohio, )

SS:

County of Cuyahoga. )

I, Cynthia Sullivan, a Notary Public within and for the State of Ohio, duly commissioned and qualified, do hereby certify that the within named witness, JONATHAN A. RODDEN, Ph.D., was by me first duly sworn to testify the truth, the whole truth and nothing but the truth in the cause aforesaid; that the testimony then given by the above-referenced witness was by me reduced to stenotypy in the presence of said witness; afterwards transcribed, and that the foregoing is a true and correct transcription of the testimony so given by the above-referenced witness.

I do further certify that this deposition was taken at the time and place in the foregoing caption specified and was completed without adjournment.

1 I do further certify that I am not  
2 a relative, counsel or attorney for either  
3 party, or otherwise interested in the event of  
4 this action.

5 IN WITNESS WHEREOF, I have hereunto  
6 set my hand and affixed my seal of office at  
7 Cleveland, Ohio, on this 7th day of November, 2024.

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14 Cynthia Sullivan, Notary Public  
15 within and for the State of Ohio

16  
17 My commission expires October 17, 2026.  
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